

April 1, 2002

To: [tsr@ftc.gov](mailto:tsr@ftc.gov)

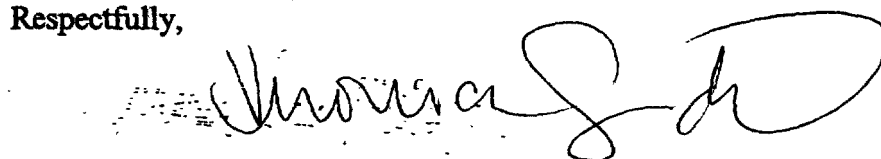
From: Telemarketing Rulemaking - Comment, FTC file number R411001

As an employee of Household's consumer lending business (HFC/Beneficial), I am opposing the FTC's proposed changes to the Telemarketing Sales Rule (TSR) for the following reasons:

1. I work for a financial services company that employs more than 30,000 people in this country. The ability to reach our customers is critical to our ability to conduct business. Passage of this new rule may have a negative impact on my job as well as other jobs in my company.
2. Household offers much needed credit to millions of consumers in the United States at reasonable prices. However, every additional regulatory burden raises the cost of credit to our customers and their families.
3. While the concept of a national "do not call" list is a good idea, the proposed changes layer a national list onto a patchwork of state lists and requirements. A more effective answer—for both consumers and businesses—is to create a "master" list, perhaps led by the FTC. Otherwise, you are simply creating a potential fifty-first state list and massive confusion.
4. The proposal to create a national list is vague and undeveloped. For example, who will fund the list? Who will have access to it? Will a telephone number or name drive it? What will ensure that the list will only be used for the purpose for which it is intended?
5. Numerous other problems exist that would severely impact Household's ability to conduct business. In particular, the provision that would force us to treat inbound calls the same as outbound calls, would severely limit our ability to offer valuable products and services to our own customers.

I am urging the FTC to withdraw the proposal in its current form. While well intentioned, the proposed changes are vague to the point of unenforceability. If passed in its current form, it will unnecessarily raise the cost of products and services that our customers depend on, and it could impact hundreds of thousands of jobs throughout the financial services industry.

Respectfully,



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